REBUTTAL TESTIMONY OF BOGDAN SZFRANIEC
ON BEHALF OF COVAD COMMUNICATIONS COMPANY

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4 **Q:** **Please state your name, title, and business address.**

5 **A:** My name is Bogdan Szafraniec, OSS Engineering Consultant for Covad

6 Communications Company. My business address is 2330 Central Expressway,

7 Santa Clara, California, 95054.

8 **Q:** **Please state your experience relevant to this proceeding.**

9 **A:** I am responsible for designing and deploying OSS gateways for Covad's use

10 throughout Covad. I have held this position since June 1999. Prior to my current

11 position, I was OSS Technical Architecture Consultant at Ameritech, the Illinois-

12 based Bell Operating Company, from 1996 to 1999. In that capacity, I was

13 responsible for the development and deployment of OSS interfaces.

14 **Q:** **Have you previously filed testimony in this proceeding?**

15 **A:** Yes, I submitted an affidavit in support of Covad's Initial Comments and served

16 as a witness at the hearings in October 2000.

17 **Q:** **Please summarize your testimony.**

18 **A.** In my testimony, I want to highlight the importance the loop makeup information

19 to the ability of Covad and other CLECs to compete effectively in Illinois. As an

20 initial matter, Covad and other CLECs need read-only direct access to all records,

21 databases and backend systems that may be useful to CLECs in provisioning

22 loops for xDSL based services that exist electronically in any Ameritech OSS,

23 whether or not such information is actually used by Ameritech employees or any

24 affiliate. I also want to emphasize that Covad and other CLECs – not Ameritech

1   – are the only ones that can determine what the "optimal" loop is for provisioning

2   their service. To do so, CLECs need loop makeup information on multiple loops

3   that are available to serve a particular residence or business so that the CLECs can

4   determine which loop would best support their service and can order that loop to

5   ensure that the customer's needs are met. Other ILECs, such as BellSouth, have

6   made this information available to CLECs. Ameritech should be required to do

7   the same.

8   Q: **Why is loop makeup information so critical to Covad?**

9   A: Loop makeup information is an integral part of the process by which Covad

10   determines whether it can offer service to a particular customer, and then proceed

11   to order the UNE loop necessary to offer that service. Without access to detailed

12   information on the loop, Covad cannot determine what type of service can be

13   offered over that loop – or whether service can be offered at all.

14   Q: **Is the selection by Ameritech of what it believes to be the "optimum loop" for**

15   **Covad's purposes sufficient to provide Covad to offer services to its end**

16   **users.**

17   A: No. The optimal loop can only be determined by Covad, not Ameritech. Covad

18   offers a wide variety of xDSL services – HDSL, IDSL, ADSL, for example. Each

19   customer comes to Covad's with different service needs. A business customer

20   may want a higher priced, higher speed DSL service, which would require a

21   shorter loop with no load coils. A residential customer may want a more

22   affordable service that provides a different DSL speed. In that case, a longer loop

23   may be sufficient. Ameritech, however, does not have this information.

1   Ameritech would have no idea which type of xDSL service Covad sought to

2   provide, and would be guessing as to which loop is "optimum" for Covad's needs.

3   As a result, Ameritech can only provide Covad with the loop that is "optimum"

4   for Ameritech's needs. Invariably, this process fails to meet Covad's and its

5   customers, needs.

6   Ameritech's own witnesses' testimony also undermines Ameritech's claim

7   that it somehow selects the "optimal" loop for CLECs. As Mr. Mileham

8   acknowledges, Ameritech returns loop makeup information on the first loop the

9   system finds, regardless of whether that loop will best support the CLEC's

10   service. As a result, Ameritech today will select for and provision to CLECs a

11   loop requiring conditioning today even though another loop is available that

12   would not require conditioning as Mr. Mileham recognizes. In doing so,

13   Ameritech increases the CLECs' costs and the time for provisioning the loop.

14   Thus, Ameritech's claims that it can best select the loop for CLECs should be

15   discounted. While Ameritech may prefer to tell CLECs what loop is best for

16   them and thereby dictate CLECs' service offering, the Commission should not

17   condone Ameritech's conduct.

18   Q: **Do the upgrades that Ameritech will provide to its OSS eliminate the need**

19   **for access to specific loop information as required by ICC?**

20   A: No. Ameritech claims that its new OSS upgrades, which were not in place at the

21   time of the ICC order in question here, make the specific loop information

22   requirements of that order no longer necessary. That is not the case. The new

23   upgrades that Ameritech describe provide (1) loop length, and (2) a green light-

1   yellow light – red light designation indicating whether the loop would qualify for

2   Ameritech's own retail DSL service. While Ameritech would have the

3   Commission believe that these "enhancements" address CLECs needs, they still

4   continue to provide Covad and other CLECs with loop makeup information on

5   only one loop and thus Ameritech continues to select what loop will serve

6   Covad's customers.

7   Q.   **Does the enhancement now available in Southwestern Bell to search for non-**

8   **loaded loops adequately address Covad's needs?**

9   A.   No. As an initial matter, Ameritech makes no commitment as to when this

10   enhancement will be available in the Ameritech region. At best, Mr. Mileham

11   states on behalf of Ameritech that "they have a target to provide business

12   requirements followed by system requirements and implementation as soon as

13   possible." It could be months or years until Ameritech has the same functionality

14   available to CLECs in Illinois. In addition, the enhancement only addresses one

15   problem with Ameritech's current OSS offerings. While some unspecified time

16   in the future, Ameritech's OSS will seek a non-loaded loop for CLECs, it will still

17   select a loop with features that are less than optimal for the CLEC's service. For

18   example, Ameritech's search function may continue to select longer loops when

19   shorter loops are available. As I've mentioned, a shorter loop allow Covad and

20   other CLECs to provide their customers with faster and higher bandwidth DSL

21   services. Yet even with the planned enhancements, Covad and other CLECs

22   would not be able to know that a shorter loop would be available. As a result,

1   Covad and other CLECs will have lost an opportunity to provide a customer with

2   the service he or she desires.

3   In sum, Ameritech's OSS enhancement does not adequately address the

4   CLEC's needs as it continues to select and offer only one loop to CLECs.

5   Ameritech should not be allowed to determine effectively what types of service

6   and speeds a CLEC can offer.

7   Q.   **Is the green, yellow, red light pre-qualification system described in Mr.**

8   **Milehan's testimony sufficient to meet Covad's needs?**

9   A.   No. The green, yellow, red light system continues to provide Covad with

10   information on only one loop. Moreover, this "enhancement" doesn't even tell

11   CLEC the actual loop length and instead provides only a range. As Ameritech's

12   witnesses acknowledge, Ameritech may provide Covad with a "green" status

13   indicator – meaning that the copper loop is less than 12,000 feet; yet, when Covad

14   places the order that loop may no longer be available or Ameritech may simply

15   chose to provision a different loop. Suddenly, Covad may find that it unable to

16   even provision DSL service to the customer. Thus, Covad cannot assure its

17   customers that it will be able to provide him or her with certain types of DSL.

18   Q.   **Can Ameritech comply with the Commission's order without extensive**

19   **discussions with CLECs and completion of the change management process?**

20   A.   Yes. Ameritech has claimed in the past that it does not fully understand what

21   CLECs seek and thus cannot implement the Commission's order in a timely

22   manner. After the UNE Remand Order was issued in the fall of 1999, Covad

23   discussed with each ILEC, including Ameritech, the implementation requirements

1   of the UNE Remand Order. In the wake of the UNE Remand Order, several

2   ILECs, including BellSouth and Qwest, began providing CLECs with greater

3   information on multiple loops that resides in its databases. Ameritech, however,

4   refused to provide Covad with similar OSS functionality. As a result, Covad

5   reiterated this requirement during the collaborative process. During the

6   collaboratives, the CLECs clearly articulated that Ameritech must provide the

7   same loop makeup information that it provides for one loop for up to 10 loops that

8   are available to serve a particular address. During this proceeding, Ameritech

9   representatives have contacted me on several occasions to clarify what is required

10   to comply with the Commission's order. In addition, I have made myself

11   available for further discussions with Ameritech to ensure that this information

12   would be available to CLECs by March 2001.

13   The CLECs need for loop makeup information on multiple loops is easy to

14   understand and implement. Ameritech currently provides various "fields" of loop

15   makeup information for one loop. Ameritech must provide the same "fields" of

16   loop makeup information for up to ten loops. In other words, Ameritech must

17   complete return the same information as it currently provides to CLECs for nine

18   more loops (if available).

19

20   It is telling that Ameritech has never disputed that information on multiple

21   loops available to serve a particular customer is available in its databases. Covad

22   and other CLECs simply seek the ability to access the information that is housed

23   in its OSS. CLECs have the right to do so under the UNE Remand Order.

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2 Q. **Does any incumbent carrier provide CLECs with loop makeup information**

3 **on multiple loops?**

4 A. Yes. As I mentioned during the prior phase of this proceeding, Qwest, Verizon

5 and BellSouth offer CLECs the opportunity to view loop makeup information for

6 more than one loop. For example, BellSouth now offers CLECs electronic and

7 manual loop makeup information on multiple loops. A CLEC, at its option, can

8 opt for manual loop makeup information. In this case, a CLEC selects whether it

9 wants information on a single working facility or a maximum of three spare

10 facilities. (BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering

11 Guide for Manual Loop Makeup Issue 1.3 April 16, 2001, Szafraniec Attachment

12 1, at 7). In addition, a CLEC can obtain loop makeup information electronically.

13 In that case, a CLEC uses a screen to search for up to 10 loops available to serve a

14 particular customer. (BellSouth Electronic Loop Makeup, D/CLEC Pre-Ordering

15 and Ordering Guide For Electronic Loop Makeup (LMU) (Version 1, March 16,

16 2001 – Posted April 26, 2001), Szafraniec Attachment 2, at 9). In addition, a

17 facility identification number is provided when the loop makeup information is

18 returned from BellSouth LFACS. (Szafraniec Attachment 2 at 9). In that way, a

19 CLEC can ensured that once it has selected the optimal loop for its service it will

20 receive the same loop from the ILEC.

21 It is well known in the industry that BellSouth's OSS systems are not

22 state-of-the art. In fact, Covad has had significant problems obtaining the

23 necessary electronic interfaces from BellSouth in a timely manner. Yet, even

1   BellSouth has offered CLECs the ability to obtain loop makeup information on

2   multiple loops and to reserve the optimal loop for the provision of the CLEC's

3   service for some time.   (BellSouth Loop Makeup (LMU) CLEC Information

4   Package (Version 3, October 23, 2000), Szafraniec Attachment 3).   There is no

5   reason that Ameritech cannot do the same.

6 Q. **In his direct testimony on rehearing, Mr. Mitchell claims that it would be**

7   **difficult to implement the Commission's order requiring that a loop be**

8   **tagged with an identifier to allow CLECs to obtain the loop viewed during**

9   **the qualification process. Do you agree?**

10   A. No. Such processes can be readily established. For example, BellSouth

11   currently allows CLECs to view electronically loop makeup information for up to

12   10 loops. When the loop information is returned from BellSouth's LFACS, an

13   identification number is included in the returned loop makeup information data.

14   As BellSouth's Pre-Ordering and Ordering Guide makes clear, the number

15   identifies the loop for which loop makeup information was retrieved. (D/CLEC

16   Pre-Ordering and Ordering Guide for Electronic Loop Makeup (LMU) Version 1,

17   March 16, 2001-Posted April 26, 2001, Szafraniec Attachment 1).   Ameritech

18   should be able to implement a similar number identification system as it, like

19   BellSouth, relies on LFACS – a Telcordia system.

20 Q. **Could Ameritech implement a system similar to BellSouth?**

21 A. As BellSouth, Ameritech and other ILECs rely on Telcordia systems, it is difficult

22   to believe that Ameritech could not rely on similar Telcordia systems or

23   enhancements. Given Covad's repeated requests for this functionality, it surprises

1   me that Ameritech has not already contacted Telcordia to inquire what it would

2   take to implement the same BellSouth functionality here in the Ameritech region.

3   As Telcordia has already developed the system, the costs should be much lower

4   than the original development costs for BellSouth. In addition, Ameritech would

5   be able to rely on software that for the most part has been production tested and

6   ready for CLEC use.

7   **Q.**   **Do you agree with Mr. Zills that implementation of the Commission's order**

8   **would require Ameritech to maintain two different loop**

9   **provisioning/assignment processes?**

10   **A.**   Again, I would have to disagree. In its application for rehearing, Ameritech stated

11   it was still evaluating its design options. Now, Ameritech claims that it would

12   need to have two distinct systems. As I previously discussed, BellSouth provides

13   CLECs with exactly the same OSS functionality as the Commission ordered here.

14   BellSouth does not have two different loop provisioning systems. Rather,

15   BellSouth enhanced its existing LFACS system (again, the same Telcordia system

16   Ameritech uses). Ameritech can do the same.

17   **Q.**   **Does this conclude your testimony?**

18   **A.**   Yes, at this time.

BellSouth Loop Makeup (LMU)

CLEC
Pre-Ordering and Ordering Guide
For
Manual Loop Makeup

(Issue 1.3 April 16, 2001)

1.1 Purpose

This document provides the Competitive Local Exchange Carrier (CLEC) with the current Unbundled Network Element (UNE) Pre-Ordering and Ordering information pertaining to BellSouth *Manual* Loop Makeup (LMU). This document serves as a supplement to the <u>CLEC Information Package (Version 3) of BellSouth Loop Makeup (LMU).</u>

The BellSouth LMU CLEC Information Package (Version 3) is located at the BellSouth Interconnection Services Web site in the CLEC Products Section at:

<u>http://www.interconnection.bellsouth.com/guides/unedocs/bstlmu.pdf</u>

1.2 Disclaimer Statement

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

This guide will be maintained until such time that it's content is incorporated into the BellSouth Business Rules – Local Ordering (BBR-LO). The BBR-LO is found at:

<u>http://www.interconnection.bellsouth.com/guides/html/leo.html</u>

Go to the third document on the next page.

1.3 Version History / Control

Any future modifications, enhancements, and/or improvements that are made to this Pre-Ordering and Ordering Guide for BellSouth *Manual* Loop Makeup (LMU) will be reflected accordingly in this section of the document.

Section	Date / Issue	Description
ALL	09/14/00 – Issue 1.0	Initial Issue Release
	01/31/01 – Issue 1.1	Notify CLEC of receipt of Manual LMU request. Ch. 5.
	01/31/01 – Issue 1.1	Requirement that for queries on ported TN, CLEC must use CKID. Ch. 5.
All Highlighted Areas	03/12/01 – Updated Version 1.2	Updated Issue Release to correct web addresses within guide.
Throughout Entire Document	04/16/01 – Updated Version 1.3	LSR requirement with LMUSI dropped with new LMUSI. New LMUSI added and instructions updated. New information added on LMU content.

1.3 Version History / Control

NOTE: Changes Referenced Pertain to Consolidation of Request to a Single Form Section Number with Subsection Title, as applicable, & Specific "Item (Number)"		
Section 5.1 "To Request Manual LMU", Items (1,5)	04/16/01 – Updated Version 1.3	Only the Manual LMUSI form is required
Section 5.1 "To Cancel Reservation", Item (2)	04/16/01 – Updated Version 1.3	LMUSI form only sent to SAC
Section 5.1 "To Cancel Pending LMUSI", Items (2)	04/16/01 – Updated Version 1.3	LMUSI form only sent to SAC
Section 5.2	04/16/01 – Updated Version 1.3	Only the Manual LMUSI form is required; form must be typewritten
Section 5.3 "Part I: "General Information"	04/16/01 – Updated Version 1.3	Additional instructions provided on the "Negotiator" field
Section 5.3 " Part II: "Customer Information"	04/16/01 – Updated Version 1.3	Yes/No input required on spare pair requests
Section 5.4	04/16/01 – Updated Version 1.3	Entire content revised

Table of Contents

3.1 Manual LMU Overview

Manual Loop Makeup (LMU) is requested via the *Manual Loop Makeup Service Inquiry (LMUSI)* process.

Manual LMU can be requested for either a working facility or for spare facilities using the following rate elements per Manual LMUSI:

USOC	Rate Element
UMKLW	MANUAL Loop Makeup - Preordering Without Reservation, per working facility queried
UMKLW	MANUAL Loop Makeup - Preordering Without Reservation, per spare facility queried [Maximum No. of Spare Facilities per Manual LMUSI is (3)]
UMKLP	MANUAL Loop Makeup - Preordering With Reservation, per spare facility queried [Maximum No. of Spare Facilities per Manual LMUSI is (3)]

BellSouth's provision of loop data to the requesting CLEC on working facilities is contingent upon ownership considerations of the loop, whether by BellSouth or the requesting CLEC. The requesting CLEC is not authorized to receive loop data on a loop owned by another CLEC.

Manual LMU of Spare Facilities may be requested With or Without Reservation. When the CLEC requests Manual LMU of Spare Facilities With Reservation, a Reservation ID is returned with the LMU information, if facilities are available. The reservation ID is also known as a Facilities Reservation Number (FRN). Hereafter within this document, this code will be referred to as the "RESID/FRN".

The reservation holding timeframe is a maximum of four days from the time that BellSouth's loop makeup data is returned to the CLEC on the facilities queried. During this holding time that a Service Order is not placed, the reserved facilities are rendered unavailable to other customers, whether for CLEC(s) or for BellSouth. Reserved facilities for which the CLEC does not plan to place a UNE service order should be cancelled by the CLEC in a timely manner.

4.1 Availability

BellSouth will offer this product in all states within the BellSouth Region.

Per Manual LMUSI request, the CLEC may inquire for Manual Loop Makeup information on a
- single working facility, or
- maximum of three spare facilities

The **STANDARD SERVICE INTERVAL** for return of a response to Manual LMUSI is three business days. This **STANDARD SERVICE INTERVAL** is a target interval. The interval is calculated from 'Receive Date' to 'LMU Return Date', and includes the time to render the Firm Order Confirmation (FOC). The FOC is rendered upon the issuance of the Billing Service Order. 'Receive Date' is defined as the date the Manual LMUSI is received by the designated BellSouth Account Team representative, and is counted as Day Zero. 'LMU Return Date' is defined as the date the LMU information is returned to the CLEC from BellSouth. The Interval calculation is reset to Zero when a CLEC initiated change occurs on the Manual LMU request.

4.2 Contract Specific Provisions

Before a Loop Makeup Service Inquiry (LMUSI) may be submitted by the CLEC, the CLEC must have an Interconnection Agreement that includes terms, conditions and rates for the LMUSI(s) being requested. For more information on Contract Specific Provisions, refer to the BellSouth LMU CLEC Information Package located at:

http://www.interconnection.bellsouth.com/products/html/unes.html

4.3 Billing Information

Manual LMU will be billed from the Carrier Access Billing System (CABS) on a 'C07' Billing Account Number (BAN). All activities herein described and associated with a unique Uniform Service Order Code (USOC) will incur a unique nonrecurring charge.

5.1 Description of Ordering Process

The following points describe the high level Manual LMU Order Process Flow. Detailed information is presented within this Chapter in the Sections that follow.

To Request Manual LMU:

1. CLECs request manual loop makeup information by submitting a Firm Order *Manual* Loop Makeup Service Inquiry (LMUSI) to the Complex Resale Support Group-UNE Group (CRSG), or to their direct Account Team for those CLECs not supported by the CRSG. Hereafter within this document, the use of "CRSG/Account Team" refers to both the CRSG-UNE Group and the direct Account Team, which ever is applicable.

NOTE: For those CLECs supported by the CRSG, refer to Chapter 7.0: Guidelines for Interfacing with the CRSG UNE Group.

2. BellSouth will provide an acknowledgement to the CLEC upon receipt of a Manual LMU request from the CLEC.

3. The CRSG/Account Team submits the LMUSI to the geographically appropriate Service Advocacy Center (SAC).

4. The SAC specialist prepares the LMU as specified on the LMUSI and returns the LMU, and the Facility Reservation (RESID/FRN), if requested and facilities are available, to the CRSG/Account Team.

5. The CRSG/Account Team sends the LMUSI to the Local Carrier Service Center (LCSC) for Billing Service Order issuance.

6. The LCSC issues the Billing Service Order for the Manual LMU.

7. The LCSC renders the Firm Order Confirmation (FOC) to the CRSG/Account Team.

8. Once the FOC has been rendered, the CRSG/Account Team returns the LMU FOC and the RESID/FRN, if applicable, to the CLEC.

5.1 Description of Ordering Process
Continued from previous page

To Cancel Reservation(s):

1. To cancel a reservation on spare facilities, the CLEC submits the LMUSI form to the CRSG/Account Team with the Cancel FRN item indicated.

2. The CRSG/Account Team sends the Cancel FRN LMUSI to the SAC.

To Cancel Pending LMUSI:

1. To cancel a pending Manual LMUSI, for which no Loop Makeup information has been processed, the CLEC submits the LMUSI form to the CRSG/Account Team with the Cancel LMUSI item indicated.

2. The CRSG/Account Team sends the Cancel LMUSI to the SAC.

5.2 Submitting a Request

For a *Manual* Loop Makeup request, the CLEC prepares and submits the

- Loop Makeup Service Inquiry (LMUSI) Form

A copy of the LMUSI Form is located at the end of this Guide. The form must be typewritten.

The CLEC submits the LMUSI form to the CRSG/Account Team for processing. See Chapter 7.0: Guidelines for Interfacing with the CRSG UNE Group of this Guide when submitting requests to the CRSG.

For a working pair LMUSI, the end user's address will be required along with either the telephone number or the circuit ID (CKID).

For spare facilities LMUSI, only the address of the service location is required.

5.3 Manual LMUSI Instructions

Instructions for preparing the LMUSI Form follow. The instructions are organized by Section, by field.

The LMUSI is a two-page form. Page 2 is only required if LMU is being requested for more than one facility (loop). A maximum of three facilities may be requested for a single service address per LMUSI request.

The form MUST be typewritten. Unless otherwise noted, there are no restrictions regarding length of fields or alpha/numeric makeup of required information.

Part I: "General Information "

Field	Instruction
SI# (PON Number)	Enter the CLEC unique Purchase Order Number (PON). This entry always required.
Firm Order	Select for initial request
Cancel LMUSI	Select to cancel *pending* LMUSI for which LMU has not yet been processed
Cancel FRN	Select to cancel RESID/FRN for pair(s) previously reserved
Change	Select to update a pending Firm Order request
Negotiator	This area is pre-populated with "**CRSG UNE TEAM**"
Negotiator's Tel Number	This area is pre-populated with "**205 321-7789**" (working telephone number for the CRSG)
Negotiator's Fax	This area is pre-populated with "**205 321-7721**" (working fax number for the CRSG)

Part II: "Customer Information"

Field	Instruction
CLEC Name	Name of the CLEC (required)
CLEC Contact/Telephone Number	Name and telephone number of the contact at the CLEC (required)
Local Serving Central Office (ACTL)	Access Customer Terminal Location (Common Language Location Identifier – 11 characters) (required)
CLEC E-mail	E-mail address of CLEC
CLEC ACNA	Access Customer Name Abbreviation
CLEC "C07" BAN	"C07" Billing Account Number (N If "C07" BAN does *not* exist)
CLEC OCN (CC)	Operating Company Number (Company Code)
REQ TYPE	Request type will *always* be AB
TOS	Type of Service will *always* be 1BF
ACT	Activity type will *always* be N (new)

Customer Billing Information: Populate if "C07" BAN does *not* exist)

BILLNM	Billing Name	STATE	Billing State
STREET	Street Address	ZIP CODE	Zip Code
FLOOR	Floor (if applicable)	BILLCON	Contact name for billing
ROOM	Room or Suite (if applicable)	TEL NO	Contact Telephone Number

Part III: "CLEC Request"

Request Options: Select *Only* One of the Three Choices
1. Provide LMU at Telephone Number/CKID
2. Provide LMU at address listed below for spare copper pair (loop facility)
3. Provide LMU at address listed below for spare Digital Loop Carrier (DLC) pair

If Selected	Then Provide	
LMU for working facility	Telephone number or Circuit ID (CKID)	
LMU for spare copper pair	Number of spare pairs required – Maximum 3	Reserve Pair(s)? **Y (yes) / N (no)**
LMU for spare DLC pair	Number of spare DLC pairs required – Maximum 3	Reserve Pair(s)? **Y (yes)/ N (no)**
Service Address	Enter the Local Exchange Navigation System (LENS), Telecommunications Gateway (TAG), or RoboTAG™ validated Service Address. Include any dept/floor/suite/room/apartment number, as well as, the U.S. postal zip code. This entry always required.	

NOTE On a Working Facility: For request on ported TNs, CLECs must use CKID

NOTE If Spare Facility(-ies): CLECs cannot request a mixture of copper and DLC pairs on a single LMUSI spare facility request. CLEC should provide a Y/N response regarding its choice for a reservation of the facility queried.

Section: "Comments"

This section is always required with *Cancel FRN*.

Enter the FRN and Cable/Pair information for the reservation being cancelled.

5.4 The LMUSI Response

Information presented on the LMUSI Response is as follows.

Section: "Outside Plant Engineering/SAC Makeup Data (N_{th}) Requested Pair"

If the LMU was requested on a working Telephone Number/Circuit ID, Outside Plant Engineering (OSPE) will fill in the Cable and Pair numbers and list the loop makeup of that Cable and Pair facility.

If spare facilities were requested and are available, Outside Plant Engineering (OSPE) will fill in the Cable and Pair numbers, populate the FRN if a reservation was requested by the CLEC, and list the loop makeup of that Cable and Pair facility.

If spare facilities are not available, or if the number of pairs available is less than the number requested, OSPE will indicate in the **Comments** section no spare pairs are available or that only some of the pairs are available.

If the CLEC indicates that they want a makeup by address for spare **copper _or_ DLC pairs:**

- The SAC will supply an LMU for up to three spare copper or DLC pairs at that address. (The CLEC will indicate the number requested up to three and will indicate if they want the pairs reserved.) If there are no spare pairs or if the number of pairs available is less than the number requested, the SAC will indicate in the "Comments" section that no spare pairs are available or that only some of the pairs are available. **If no spare pairs are available no LMU is returned.** The LMUs for the requested number of pairs will be detailed in sections labeled "Outside Plant Engineering Data First Requested Pair," "Outside Plant Engineering Data Second Requested Pair" and "Outside Plant Engineering Data Third Requested Pair." The later two are on page 2 of the LMUSI. The requested pairs will be reserved with unique FRNs. **The LMU process returns no specific loop types. The only consideration is that they be copper if copper is asked for and they must be spare.**

OSPE will return the completed LMUSI to the Account team/CRSG.

5.5 The LMU Content

Loop Makeup Data is defined as the physical characteristics of the loop facilities, starting at the BST central office (CO) listed in chronological order and ending at the serving distribution terminal. Loop makeup data will consist of cable gauge and length, bridged taps (BT), load coils (LC), presence of Digital Loop Carrier (DLC) and any other equipment that is part of the local loop facilities.

The loop makeup will be listed on the LMUSI in segments. Segments equate to f(n) cables starting at the CO or RT with the f(1) and ending at the end user location f(n). Each segment will be broken down by break points. Break points are cable gauge change locations, environment changes and bridged tap points. Bridged tap will include the distance offset where the bridged tap occurs from the beginning of the segment, as well as the gauge and length of the bridged tap. The type of load coils used, if any, will be indicated and the CO end section and load coil spacings will be indicated. Each load coil spacing should be entered, the maximum being 17. If the loop begins at a RT the Remote Location Address (RLA) and CLLI of the RT will be indicated. The origin of the segment will be shown and will indicate "CO" or "RT" where the cable originates at a CO or RT, or it will contain the address of the cross-box where the cable originates. The following is an example of a typical LMU returned with two segments, f(1) and f(2), including loading. Lengths should be shown in kilofeet to two decimal places.

An example of a loop makeup response is as follows:

Segment 1 (F1)

Load coil type= **H88** Load spacing= **5.9, 5.85**   CO end section=**2.8**

Origin= <u>**CO**</u>   RLA=   RT CLLI=

#	Gauge	length	Environment	BT Offset
1	24	13.75	U	
2	26	2.85	U	
3	26	1.0	B	16.6

Segment 2 F(2)

Load coil type=   Load spacing=   CO end section=

Origin=**f 3522 misty valley dr**   RLA=   RT CLLI=

#	Gauge	length	Environment	BT Offset
1	26	1.09	B	
2	24	1.60	B	
3	24	0.60	B	2.69

(Build out capacitors will be shown on a separate line with the following information: BOC=(Capacitance), (offset) such as BOC=.01, 2.50, which indicates a build out at 2.5 kf from the beginning of the segment and the capacitance is .01 microfarads.)

6.1 Placing a UNE Service Order

Once the CLEC has received the LMU of a working TN or CKID, or received the LMU of spare facility(ies), and optionally reserved single or multiple spare pairs, the CLEC may determine if they wish to place an order for **BellSouth Unbundled Loop Modification** CLEC Information Package and/or for a UNE Service Order (e.g. for a 2-wire ADSL compatible loop). For such a UNE Service Order, either refer to **BellSouth Unbundled ADSL/HDSL Compatible Loops CLEC Information Package**, or to **BellSouth Unbundled Copper Loop CLEC Information Package**.

This information referenced above is located at the BellSouth Interconnection Services Web site in the CLEC Products Section at:

http://www.interconnection.bellsouth.com/products/unes.html

7.1 Submitting LMUSI to the CRSG UNE Group

Internet Email is required to submit LMUSI form to the CRSG UNE Group.

The following guidelines should be followed when submitting requests to the CRSG UNE Group.

Guidelines for Interfacing with the CRSG UNE Group

- In order to serve customers as efficiently as possible for manual requests, the CLEC should communicate with the CRSG UNE Group via email, whenever possible. New LMUSI orders should be submitted to the CRSG UNE mailbox. CLEC initiated corrections, and clarification responses should be submitted via email to the Systems Designer assigned to the account in the CRSG.

- The CRSG UNE Group email address is crsg.une@bridge.bellsouth.com.

- When submitting the request via email, submit only 1 PON (LMUSI) per mail message.

- Use the following guidelines in formatting the email subject header.

Email Subject Header	Purpose
PON 12345 LMU NEW	For a new LMU order
PON 12345 CORRECTION	For a CLEC initiated correction or update
PON 12345 CLARIFICATION RESPONSE	For a clarification response
PON 12345 CANCEL	For a cancellation
PON 12345 STATUS	For a status request

Every effort should be used to submit requests to the CRSG UNE Group via Internet Email. In cases of extreme circumstances when Internet Email is not available, contact the UNE Group Sales Support Manager as indicated in Section 7.6 CRSG UNE Group Escalation Procedures of this document.

7.2 Verification Performed by the CRSG UNE Group

The CRSG UNE Group verifies the following fields on the LMUSI:

Form	Fields Verified
LMUSI	CLLI, ADDRESS, # OF SPARE PAIRS, BILLING INFORMATION

7.3 Reporting Status to the CLEC

The CRSG UNE Group provides CLECs with the "Open PON Status Report" on a daily basis. The purpose of the report is to provide status of the PONs <u>open</u> in the CRSG for processing. A PON is considered <u>closed</u> in the CRSG once the PON has either been FOCd or the PON has been Cancelled. Once a PON has been posted 'Closed', it will no longer appear on the Open PON Status Report.

The report is pulled once per day, BEFORE 8:30am CST, and sent via email to the designated recipient.

The report shows the following information:

- CLEC NAME
- DATE RECEIVED
- END USER NAME
- STATE
- TYPE OF SERVICE
- PON NUMBER
- CLARIFICATION DATE – IN & OUT
- DATE OF SERVICE INQUIRY
- DATE SENT TO LCSC
- CANCELLATION, if applicable
- NOTES TO CLEC

7.4 To Request UNE Status

To request PON specific UNE Status, the CLEC should send an Internet Email message to the CRSG System Designer assigned to their account.

The Email message header should read as follows:

<u>PON 12345 STATUS</u>

where '12345' represents the PON Number, e.g. PON AL987654-00 STATUS.

7.5 To Specify CLEC Recipient of Open PON Status Report

To request a change to the Email Distribution List of the Open PON Status Report, send an Internet Email message to the CRSG System Designer assigned to the account.

The Email message header should read as follows:

CHANGE PON STATUS REPORT DISTRIBUTION LIST

7.6 CRSG UNE Group Escalation Procedures

The following steps should be followed to initiate escalation within the CRSG UNE Group:

First Level of Escalation   Systems Designer assigned to the order

Second Level of Escalation   Customer Care Advocate
                                                      Lillie Warner (205) 321-2784

Third Level of Escalation   Sales Support Managers
                                                  Cheryl Lewis (205) 321-4607
                                                  Ruby Neely (205) 321-4621

Fourth Level of Escalation   Sales Support Director
                                                  John Ray (205) 321-7791

Loop Makeup Service Inquiry

SI # (PON Num.)_____   Firm Order ____Change ___ Cancel FRN____ Cancel LMU SI____

Negotiator   **CRSG UNE TEAM**   Negotiator Telephone Number   **205-321-7789**   Negotiator FAX   **205-321-7721**

Part II -- Customer Information:

CLEC Name _____   CLEC Contact/Telephone number _____

Local Serving Central Office (ACTL) _____   CLEC Email_____

CLEC ACNA _____   CLEC "C" BAN _____ (N if "C" BAN does not exist)

CLEC OCN (CC): _____   REQ TYPE: <u>AB</u>   TOS: <u>1BF</u>   ACT: <u>N</u>

Customer Billing Information: (Populate if "C" BAN does not exist)

BILLNM		STATE	
STREET		ZIP CODE	
FLOOR		BILLCON	
ROOM		TEL NO	

Part III -- CLEC Request
(Choose **one** of the following three choices, CLEC to indicate loop makeup type required, by telephone number/CKID, spare at address/copper or spare at address/DLC)

_____Provide LMU at Telephone Number/CKID _____

_____Provide LMU at address listed below for spare copper pair.   _____Number of spare copper pairs required (Max. 3)
_____Reserve Pair (s) in database (Y/N)?

_____Provide LMU at address listed below for spare DLC pair.   _____Number of spare DLC pairs required (Max. 3)
_____Reserve Pair(s) in database (Y/N)?

Service Address _____

_____

_____

Part IV -- Outside Plant Engineering Makeup Data First Requested Pair:
Fill in Cable, pair and FRN if spares requested, Fill in FRN if reservation is requested.

Cable F1: _____ **Pair:** _____   **FRN:** _____
Cable F2: _____ **Pair:** _____
Cable F3: _____ **Pair:** _____
Cable F4: _____ **Pair:** _____

This is a loop makeup for facilities listed above for the telephone number or address indicated in Part III.

Part V -- Comments

Prepared by (Facility Engineer) _____   Telephone Number _____

Return to Negotiator within 2 working days. Call negotiator if any delay is expected or incurred.   Revised 03-28-01

"The information contained herein is based upon BellSouth's records. This is the same information that BellSouth uses to determine loop compatibility for its own services. BellSouth cannot and does not warrant that the information contained herein is accurate in every case."

Loop Makeup Service Inquiry

SI # (PON Num.)_____

Negotiator **CRSG UNE TEAM**   Negotiator Telephone Number **205-321-7789**   Negotiator FAX **205-321-7721**

Part IV (cont) -- Outside Plant Engineering Makeup Data Second Requested Pair:
Fill in Cable, pair and FRN if spares requested, Fill in FRN if reservation is requested.

Cable F1: _____ Pair: _____ FRN: _____

Cable F2: _____ Pair: _____

Cable F3: _____ Pair: _____

Cable F4: _____ Pair: _____

This is a loop makeup for facilities listed above for the telephone number or address indicated in Part III.

_____

_____

_____

_____

_____

_____

_____

_____

_____

Part IV (cont) -- Outside Plant Engineering Makeup Data Third Requested Pair:
Fill in Cable, pair and FRN if spares requested, Fill in FRN if reservation is requested.

Cable F1: _____ Pair: _____ FRN: _____

Cable F2: _____ Pair: _____

Cable F3: _____ Pair: _____

Cable F4: _____ Pair: _____

This is a loop makeup for facilities listed above for the telephone number or address indicated in Part III.

_____

_____

_____

_____

_____

_____

_____

_____

_____

Part V -- Comments

_____

_____

_____

Prepared by (Facility Engineer) _____ Telephone Number _____

Return to Negotiator within 2 working days. Call negotiator if any delay is expected or incurred.   Revised 03-28-01

"The information contained herein is based upon BellSouth's records. This is the same information that BellSouth uses to determine loop compatibility for its own services. BellSouth cannot and does not warrant that the information contained herein is accurate in every case."